

DRAFT
BROWNFIELDS CLEANUP GRANT

FOR THE
1001 SOUTH 6TH STREET
COUNCIL BLUFFS, IA
IN THE SOUTH MAIN BROWNFIELDS PROJECT AREA



DRAFT
OCTOBER 23, 2008
US EPA GRANT APPLICATION

SUBMITTED BY
THE CITY OF COUNCIL BLUFFS, IOWA

Applicant Information

1. Applicant Identification	City of Council Bluffs, Iowa – 1001 South 6 th Street
2. Funding Requested	
a. Grant Type	Brownfield Cleanup Grant
b. Amount	\$200,000
c. Contamination:	Hazardous Substances
3. Location	City of Council Bluffs, Iowa
4. Project Contacts	<p>Mr. Donald Gross Director Department of Community Development City of Council Bluffs 209 Pearl Street Council Bluffs, Iowa 51503 Phone: (712) 328-4629 FAX: (712) 328-4915 E-Mail: dgross@councilbluffs-ia.gov</p> <p>Mayor Thomas P. Hanafan City of Council Bluffs 209 Pearl Street Council Bluffs, Iowa 51503 Phone: (712) 328-4601</p>
5. Date Submitted	October 12, 2007
6. Project Period:	July 1, 2008 – September 11, 2011
7. Population	58,268 (2000 Census)
8. Other	Additionally, the target area and site is located within a designated Urban Renewal Area based on the presence of slum and blighting conditions and is part of a state designated Iowa Enterprise Zone.
9. Cooperative Partners	<ul style="list-style-type: none"> ▪ Bob Mundt, Council Bluffs Chamber of Commerce – 712-325-10000 ▪ Sheryl Garst, Pottawattamie Co. Development Corp. – 712-325-1000 ▪ Greg Reeder, City Engineer – 712-328-4635 ▪ Doug Drummy, Council Bluffs Water Works – 712-328-1008 ▪ Ron Hopp, Council Bluffs Parks & Recreation – 712-328-4650 ▪ Tom Jensen, Council Bluffs Senior Center – 712-323-5995 ▪ Gina Primmer, Habitat for Humanity – 712-328-9476 ▪ Joe Kueper, Community Housing Investment Corp. – 712-328-6602

Threshold Criteria

A. Applicant Eligibility

The City of Council Bluffs, Iowa is a municipal corporation as defined by the Code of Iowa, Chapter 362. The City was incorporated on April 13, 1853.

B. Letter from State Environmental Authority

Exhibit A is a letter from Mr. Mel Pins, representing the Iowa Department of Natural Resources, acknowledging the City's intent to file the Brownfields Cleanup Grant with the U.S. EPA.

C. Site Eligibility and Property Ownership Eligibility

1. Basic Site Information: a. Part of the former International Harvester campus. b. 1001 South Sixth Street, Pottawattamie County, Council Bluffs, Iowa. c. Pottawattamie County Development Corporation is the current owner. d. The City is not presently the owner of the subject property; however, it will take title on or before June 30, 2008.
2. Status and History of Contamination at the Site: a. The site is contaminated by hazardous substances commonly associated with former coal gas manufacturing plants. b. Originally developed in the 1890's, the subject property has been dedicated to the following uses: residential, agricultural implement warehouse, an abutting railroad on the eastern property line, and a video rental business. The site is currently vacant. c. Results of sampling completed at the subject property indicate groundwater and soil impacted by contaminants often associated with manufactured gas plants. d. Sampling results indicate groundwater and soil contamination associated with manufactured gas plants.
3. Sites Ineligible for Funding. The site is not listed or proposed for listing on the National Priorities List, is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA and is not subject to the jurisdiction, custody, or control of the United States government.
4. Sites Requiring a Property-Specific Determination. Based on information obtained to date, the City of Council Bluffs believes the subject property is eligible for funding without a property-specific determination. The Site was subject to a Phase I and II Environmental Site Assessment (ESA) under EPA Brownfields Assessment Grant awarded in 2005. In addition, the EPA determined that the site is eligible for the use of EPA funds to conduct environmental investigations.
5. Environmental Assessment Required for Cleanup Proposals. A written ASTM Phase I and II ESA report prepared in compliance with ASTM E1527-00 was completed in 2003 prior to acquisition of the site by Pottawattamie County Development Corporation in December 2006.
6. Property Ownership Eligibility. The Pottawattamie County Development Corporation is the current owner of the subject property. A Phase I and Phase II ESA were performed on the site prior to the City acquiring the site from the previous property owner. The City of Council Bluffs and the PCDC meets the definition of a Bona Fide Prospective Purchaser.

7. Enforcement Actions. No environmental enforcement actions are ongoing on the brownfields site for which funding is being sought.

8. Information on Liability and Defenses/ Protections

a. Information on the Property Acquisition: The subject property was acquired by PCDC through an eminent domain procedure. The City will purchase the property by fee simple title from PCDC prior to June 30, 2008. The City and PCDC have an extensive history of working on the acquisition of contaminated and/or blighted properties, removing the environmental concern and facilitating the reuse of the property.

b. Timing of Hazardous Substance Disposal: No disposal activities will occur before the City will acquire the property. In addition, neither the City nor PCDC caused or contributed to any release of hazardous substances at the site. Nor has either entity arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

c. Pre-Purchase Inquiry: Under contract through an EPA Brownfields Assessment Grant awarded to the City of Council Bluffs, Howard R. Green Company performed an ASTM E1527-05 Phase I ESA in October 2006. A Phase II ESA was completed in March 2007.

The Howard R. Green Company personnel responsible for completing the reports on the Site are Mr. Michael Fisher, Mr. Ronn Beebe, and Ms. Cynthia Quast, P.E. Mr. Fisher is a Registered Environmental Manager (R.E.M.) with experience in a variety of environmental issues including compliance, permitting, and investigation of hazardous waste sites and is the Company's Environmental Discipline Leader. Mike was also the recipient of the 2000 EPA Region VII Partnership Award for excellence in all aspects of brownfields investigation, cleanup, and economic redevelopment in Iowa. Mike has completed the U.S. EPA Region VII Quality Assurance training and is 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) certified. Mr. Ronn Beebe is a geologist with experience with a wide variety of environmental issues including compliance, emergency response, investigation, remediation, stabilization, management, permitting, and risk based assessments of hazardous waste sites. Mr. Beebe is 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) certified. Ms. Cynthia Quast is a licensed professional engineer and groundwater professional in the State of Iowa who has experience with a wide variety of environmental issues including investigation, remediation, and risk-based assessments of hazardous waste sites. Ms. Quast is 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) certified and has completed the EPA Quality Assurance Training.

d. Post-Acquisition Uses. The Site has been vacant since the acquisition.

e. Continuing Obligations. The City has secured the Site to minimize unauthorized access to the site, actively participates in the monitoring of known Site contaminants, and complies with all state and local requirements. The City of Council Bluffs currently has a City Ordinance that prohibits the installation of any new water wells. In addition, other controls required on the site will be strictly enforced through land deed restrictions and the municipal permitting process. The City will assist and cooperate in performing the cleanup, including providing access to the property. The City will comply

with all information requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices throughout the cleanup process.

D. Cleanup Authority and Oversight Structure

1. The City of Council Bluffs will serve as the Lead Agency and Mr. Don Gross will function as the Project Director. Mr. Gross will receive technical support from the Mayor's office, City Attorney, Public Works Department, City Health Department, Department of Community Development, Pottawattamie County Development Corporation, the EPA, Iowa DNR, and Project Environmental Consultant.

Once the site is acquired by the City, the property will be enrolled in Iowa's Land Recycling Program with the intent of applying risk-based standards and ultimately securing a No Further Action Certificate. Oversight inspectors will be provided by the City to ensure that the approved corrective action plan is implemented properly and to maintain a clear line of communication between the contractor, the City, and the public.

2. In the event that access to adjacent properties is necessary, the City will work with affected property owners to secure a voluntary access agreement. In this case, adjacent properties are owned by the Pottawattamie County Development Corporation (PCDC). Considering that the City and PCDC work very closely on projects like this, gaining voluntary access is ensured.

E. Cost Share

The City of Council Bluffs will fulfill its cost share arrangement by programmatic staff support throughout the grant project period, and committing capital toward cleanup activities. The City of Council Bluffs will provide additional staff support to keep the surrounding community informed as to the progress of the cleanup process and engage them cultivating ideas for the redevelopment of the site. In addition, City staff will provide input and support to the cleanup planning and interagency coordination with the EPA, Iowa DNR, and the City of Council Bluffs Health Department. The required cost share for this grant may come in part from City general obligation funds and/or tax increment revenues.

Ranking Criteria for Cleanup Grants

A. Cleanup Up Grant Budget

Budget Categories	Project Tasks		
	Community Involvement	Site Cleanup	Cleanup Planning & Interagency Coordination
Personnel			
Travel			\$3,000
Equipment			
Supplies	\$2,000		
Contractual	\$7,500	\$172,500	\$15,000
Other			
Subtotal	\$9,500	\$172,500	\$18,000
<i>Cost Share</i>	<i>\$10,000</i>	<i>\$22,000</i>	<i>\$8,000</i>
Total	\$19,500	\$194,500	\$26,000

Budget Tasks:

- Task 1 – Community Involvement: The City will assume full responsibilities for various community outreach activities. These efforts will include hosting public meetings, soliciting input on cleanup alternatives, preparing and disseminating project progress reports via a project web site and printed publications. The budgetary allocation for supplies includes the cost of printing a project newsletter and setting up the project web site.
- Task 2 – Site Cleanup: This task includes securing the services of a certified hazardous waste disposal contractor and environmental consultant to implement the corrective action plan. The City's financial commitment will result from capital committed to this task. The City envisions excavating Range 1 soils and replacing with clean fill material.
- Task 3 – Cleanup Planning and Interagency Coordination: Activities associated with this task include working with a professional environmental contractor to prepare the cleanup specifications and necessary bid documents. In addition, the City will coordinate its efforts with the City Health Department, Iowa DNR and the EPA to ensure that appropriate steps are being taken to prevent exposure of contaminants and protect human health and the environment. the City will use a portion of grant proceeds to attend appropriate Brownfield Conferences and/or meetings to keep apprised of current approaches to remediate hazardous materials – particularly those commonly associated with former manufactured gas plants.

B. Community Need

1. The South Main Brownfields Project Area is among the oldest and most deteriorated industrial districts in Council Bluffs. Several properties have been left vacant and very little new investment has occurred in the area. Residents in adjacent neighborhoods represent low income and economically disadvantaged areas that bear a disproportionate share of living in an area stigmatized by depressed property values, heavy truck and railroad traffic, urban noise and odors associated with manufacturing processes. The table below further illustrates the environmental justice factors that support community

needs relating to this project area. Specifically, the population of the target area has a per capita income as low as \$16,700 which is approximately 18% less than the statewide average and 9% less than the citywide average. As much as 11% of families residing within the target area receive supplemental security income from the federal government. This is more than double the Iowa rate of 3% and nearly double the city average of 4%. Up to 5% of the residents in the target area receive some form of public assistance income. This exceeds the statewide and citywide percentages of 3% and 4% respectively. As much as 8% of the residents in the target area are minorities. This exceeds the statewide and citywide percentages of 5% and 4% respectively.

Factor/Area	Target Area "A" ¹	Target Area "B" ²	City of Council Bluffs	Pottawattamie County	State of Iowa
Total Population	3,155	2,426	58,249	87,704	2,926,324
Poverty Rate ³	7%	11%	10%	8%	9%
% of Children under 5 years living in poverty	10%	3%	12%	12%	10%
Unemployment Rate	N/A	N/A	3.4%	3.4%	3.9%
Per Capita Income	\$16,700	\$19,527	18,143	\$19,275	\$19,674
% Minority Population	8%	4%	4%	3%	5%
% Households receiving SSI	7%	5%	4%	2%	3%
% Households receiving Public Assistance	3%	5%	4%	5%	3%

Sources: Information associated with total population, poverty rate, per capita income, percent minority population, percent households receiving SSI and Public Assistance were obtained from the 2000 U.S. Census. Unemployment Rate information reflects August 2007 statistics issued by Iowa Workforce Development.

In addition to this information, the University of Iowa published a study entitled, *2007 Cancer in Iowa Report* that cited Pottawattamie County as one of the top ten counties in Iowa for projected cases of cancer and estimated numbers of deaths attributed to cancer. Moreover, as a percentage of new cancers and cancer deaths between 1973 and 2001, Pottawattamie County had the highest death rate in Iowa.

In nearly every measurement attributed to characterizing disadvantaged neighborhoods, residents in the proposed brownfields target area bear a comparatively high burden of living in an economically disadvantaged area. Moreover, exposure to carcinogens in the greater Council Bluffs area is clearly higher than other communities and counties in Iowa. Consequently, the City's plan to use these Brownfields Assessment funds to complete environmental site assessments on priority sites, determine

¹ Census Tract 308

² Census Tract 310

³ Defined as the percentage of citizens living below the poverty line.

if there is a significant environmental concern and if one or more exist, apply appropriate institutional or engineered controls to address identified concerns. And, if appropriate, implement cleanup standards that help facilitate renewed interest in improving the economic vitality in the area for both residents and businesses, plus remove the potential adverse environmental concerns.

2. The presence of several underutilized, vacant and abandoned commercial and industrial buildings raises questions of environmental contamination, which depresses area property values and exacerbates the economic isolation of the affected residents. As reflected in the table cited above (B.1), residents within the targeted areas bear a disproportionate level of exposure to potentially harmful environmental conditions. Moreover, these residents are predisposed to comparatively low-income and a consequential inability to move elsewhere. In addition, case workers at local Iowa Workforce Centers indicate that a significant volume of clients reside within the affected area.

Planned cleanup activities for the 1001 South 6th Street property will remove the environmental stigma associated with this site and help facilitate its reuse. This site is part of a small campus of properties that were used by International Harvester. In fact, an adjacent property (1000 South Main Street) is in process of being acquired by Artspace Incorporated for conversion into a 36 unit live/work affordable housing project, with 9 artist galleries/work spaces. This project will result in the investment of \$11.4 million and provide a creative and sustainable reuse for this vacant and underused site. The City envisions similar opportunities for the subject property.

This cleanup effort will add stability to the adjoining neighborhood and affected residents. Moreover, these efforts will help leverage funds from other sources and provide solid justification for investing public funds based on identified needs.

3. Since its incorporation in 1853, Council Bluffs has been known as an industrial community with significant links to the agricultural, food product, and heavy machinery manufacturing businesses. While contributing to the economic strength of the community, some of these businesses have also had or pose an adverse environmental impact on the community. For example, Council Bluffs has a total of 228 EPA Regulated Facilities, 128 Resource Conservation and Recovery Act (RCRA) Hazardous Waste Generators, 68 Regulated Air Emissions sites, 6 Toxic Release Inventory sites, 21 Comprehensive Environmental Response and Compensation Liability Act (CERCLA) sites, and 11 sites with EPA violations. In addition, the Iowa Department of Natural Resources (IDNR) database has identified 34 National Response Center (NRC) Spill sites, 1 IDNR Hazardous Waste Site, 2 IDNR Landfill sites, and 119 IDNR Leaking Underground Storage Tank (LUST) sites.

In several instances, the presence or perceived presence of environmental impairments have been complicated by the declining use and closure of many traditional manufacturing operations such as rail yards, lumberyards, foundries, general manufacturers, food processing plants and related supporting businesses in the South Main Brownfields Project Area. These factors have contributed to reduced property values of vacant and abandoned industrial buildings as well as the value of homes in adjacent residential neighborhoods. Additionally, potential health concerns stemming from the likely presence of hazardous materials and petroleum-based contaminants, and the presence of attractive nuisances that contributes to children being attracted to unsecured areas, clearly has a deleterious effect on the economic, health and environmental impacts of the area.

C. Sustainable Reuse of Brownfields

The South Main Brownfields Project is consistent with the goals of the EPA's brownfields initiative and provisions within the South Main Urban Renewal Area Plan and other plans adopted by the Council Bluffs City Council. The summary below highlights the relationship between each EPA program goal and the City proposed repose.

1. The City is working with local and state health and environmental agencies to prevent pollution and reduce resource consumption. For example, the City Health Department and Fire Marshall have cited several recommendations designed to mitigate exposure to known contaminants. Among these recommendations is adopting risk-based corrective actions based on future use, considering the application of institutional controls and insurance, and empowering the public to act with respect to the type of risk communicated. Moreover, the City encourages and provides incentives to economic development projects that include green building design, alternative storm water management, environmentally beneficial landscaping and other building and design approaches to sustainable redevelopment.

Through this redevelopment process, the City has adopted several initiatives to prevent the creation of future brownfields sites. For example, the City Council applies financial incentives to encourage new, cleaner industries to develop in areas impacted by abandoned or underdeveloped properties. The City Council has also adopted ordinances, land use restrictions and procedures that prohibit or add regulatory review to land use types that have historically had an adverse impact on the environment. Additionally, the City's zoning ordinance prohibits the construction of private wells and encourages the appropriate abandonment of private wells.

2. Exhibit B illustrates the proposed redevelopment plan for the South Main Brownfields Project Area. The intent of this plan is to create opportunities for new private sector investment in the area that creates sustainable employment opportunities, enhanced tax base and benefits residents in the adjacent neighborhoods. Recommended uses include a mixed office and warehouse area, with neighborhood scale commercial areas abutting arterial streets and the residential areas, and integrating the use of streetscape and greenspace to help buffer and mitigate impacts brought on by differing land uses. A clear goal of this plan is to create quality employment opportunities, expand the tax base and enhance the property values in the area. We are confident this plan achieves these goals.

Since the original Brownfield Assessment Grant was awarded in 2005, Council Bluffs and Pottawattamie County Economic Development has acquired several sites and is working with a number of private sector businesses that are considering reinvestment opportunities for properties within the target area. The Brownfield Assessment Grant has been instrumental in terms of identifying and mitigating concerns associated with perceived environmental impairments. The City of Council Bluffs believes that this process can be perpetuated through renewed funding.

3. The South Main Brownfields Plan integrates mixed uses to create economic opportunity for those seeking employment, while creating commercial retail and housing alternatives that compliment adjacent neighborhoods and contribute to their sustainability. For example, the inclusion of a senior housing development will provide an important anchor project for the south end of the downtown area

and provide convenient means of transporting seniors and other citizens via public transit, trail/sidewalk systems, private vehicle, etc.

One of the greatest examples of how this project promotes sustainable reuse is in the commitment to reinvest in the city's urban core. Rather than perpetuating growth at the urban fringe, the City is making a clear commitment to revitalize underdeveloped and environmentally impaired areas that have a wide array of public utility services and resources. In fact, the presence of the Council Bluffs Senior Center provides inter-generational programs for senior citizens and area youth. Additionally, Habitat for Humanity, which operates a facility in the target area, and the Community Housing Investment Corporation target sites in the area for new housing construction for low-income individuals. Lastly, the Council Bluffs Panthers Wrestling Club is conveniently located to disadvantaged youth living in the area and provides youth programming.

Redevelopment within this target area will promote the use of several transportation choices. Planned improvements include provisions for trails linking neighborhoods with employment centers, retail districts, schools, and recreational venues such as area parks and regional trail systems. In addition, the target area is served by a regional transit and para-transit system to meet the needs of families with limited transportation options and/or physical disabilities.

D. Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purpose

The South Main Brownfields Plan creatively uses greenspace and open space areas to buffer residential areas from proposed commercial and office/warehouse districts. This is a constructive means of transitioning different land uses while establishing urban stability in the area. To illustrate, greenspace buffers will serve both to transition land uses while integrating pedestrian facilities to accommodate residents coming and going to work, exercise, or shop. The clear advantage to this approach is that these facilities will be owned and maintained by the City of Council Bluffs. This will ensure long-term management and care for the facilities as well as meet the demands of the community. In addition, the application of policies and using regulatory agencies like the Iowa Department of Natural Resources to apply risk-based corrective actions that are consistent with future uses as well as applying institutional and engineered controls will provide for the long-term management and care of the area.

As referenced in Section D, the Habitat for Humanity facility, Council Bluffs Senior Center, and Council Bluffs Panthers Wrestling Club are representative non-profit organizations within or adjacent to the South Main Brownfields Project Area and provide a wide array of programming for area citizens. Additionally, these organizations also contribute to building neighborhood stability.

It is also important to point out that the proposed reinvestment in the area will preserve the open space and the urban fringe. As part of the City's growth management practices and consistent with the Comprehensive Plan, the City Planning Commission and City Council emphasize the reuse and revitalization of urbanized areas to the extent possible versus encouraging development at the fringe of Council Bluffs. The net result is facilitating higher density development within the city limits, preserving agricultural land and the unique geological formation in the form of the Loess Hills.

E. Pre-Award Community Notification

1. The City of Council Bluffs has initiated several efforts to inform the citizens, affected property owners and other interested parties about the scope of this brownfields redevelopment initiative. These public involvement efforts have also attempted to engage citizens and other stakeholders in the preparation of this funding proposal. Applying several community notification and involvement measures allowed various stakeholders to participate in grant development efforts based on their individual schedules and level of interest.

The community notification approaches used to prepare this funding proposal included:

- *Posting draft documents at public venues:* A copy of the draft Assessment Grant was provided at the City Clerk's office and public library. Also included was a copy of the EPA Proposal Guidelines for Brownfields Assessment Grants. This would enable the reviewer to consider and offer comments on responses to questions consistent with the EPA Grant Guidelines.
 - *Posting draft documents on the City Internet Website:* Similar to posting the information at public venues, the City also posted draft documents on the City's website soliciting comments and suggestions.
 - *Publishing notices for public comment through local media outlets:* The City issued press releases to area newspapers asking citizens to participate in the grant development process. The message also included information about where and how they could be involved in the project.
 - *Engage specific interest groups:* Copies of the draft grant and associated proposal guidelines were mailed to the Department of Public Works, the Department of Public Health, Community Housing Investment Corporation, Pottawattamie County Development Corporation, Council Bluffs Chamber of Commerce, and non-profit organizations.
 - *Hosted a public meeting:* The City publicized a public meeting held in the Community Hall at 205 South Main Street, Council Bluffs, Iowa on October 2, 2007. Invitations were mailed to affected residents, property owners, the Department of Public Works, Department of Public Health, Community Housing Investment Corporation, PCDC, Council Bluffs Chamber of Commerce, and non-profit organizations. The public meeting included a presentation summarizing the scope of the project and draft responses to various questions raised by the EPA. The presentation also included hand out materials and contact information for participants to follow up if they had information to offer at a later date.
 - *Adoption of a City Council Resolution:* The Council Bluffs City Council adopted a resolution of support and endorsed the submission of the grant proposal. This meeting and Council action was subject to a published public notice and included time for public comment prior to taking action on the resolution.
2. The City employed a diverse public notification method to encourage a relatively high participation rate. The City recognizes that citizens and stakeholders use several means to collect information on public affairs; consequently, Council Bluffs used several methods such as posting documents at locations frequently visited by citizens – including the City's Internet Web site, via the local newspaper and/or other media outlets, and attending public meetings. In addition, the significant concentration of Spanish-, Indo-European-, and Asian-speaking citizens residing in these areas resulted in the citing the availability of translated notices upon request.

3. The public comment period began Monday, September 24, 2007 via the issuance of a Press Release that was disseminated to the local and regional newspapers. The comment period ended Thursday, October 11, 2007 so ideas and recommendations could be incorporated into the final document. Citizens were encouraged to review draft documents, submit comments, questions, etc. The City used both hard copy "comment cards" that were collected weekly and e-mail contacts to gather information. In addition, the open house event encouraged participants to ask questions or share ideas via oral communication.
4. All comments were incorporated into the draft document to the extent possible. Several ideas, suggestions and comments did not specifically address the funding guidelines. In some instances, written comments or those forwarded via e-mail requested responses; consequently, staff followed up with either written responses or a telephone call.

F. Ongoing Community Involvement

1. Council Bluffs has used several community involvement approaches to identify and engage various stakeholder groups in the preparation of this funding proposal. However even before the preparation of this funding request, the City initiated several other initiatives that brought various segments of the community together to define the redevelopment needs of the South Main Brownfields Project Area and define how these ideas would make Council Bluffs a more vibrant community. For example, the creation of the South Main Urban Renewal Area Plan involved numerous interest groups such as the Chamber of Commerce, Pottawattamie County Development Corporation (PCDC), the Iowa West Foundation, Council Bluffs Senior Center, affected property owners, and residents. This commitment to meaningful community involvement has resulted in a redevelopment plan posed for positive change and has cultivated community support. In fact, the Iowa Architectural Foundation has selected this project area for a design charrette in April 2008. The City is very eager to gain the insights provided by this expert panel and put their recommendations to work.

To ensure that this project stays at the forefront of community revitalization efforts and is implemented as planned, the South Main Brownfields Project Steering Committee has been assembled. With representation from the groups listed above, the Steering Committee will use this assessment grant to assess environmental risk associated with acquiring targeted sites, make recommendations to the City and PCDC regarding the acquisition, cleanup and redevelopment of these sites and ultimately banking them for future redevelopment. Additionally, the Committee will be integral to leverage the City's efforts to keep the community and area stakeholders informed about the progress of the project and solicit feedback concerning cleanup decisions and reuse planning in the context of what the ESAs uncover. The City will act in a manner consistent with the National Contingency Plan relative to designating a spokesperson to inform the community, preparing an Risk Evaluation Response Action (RE/RA) Plan, developing and implementing a community relations plan, identifying a repository for related information, publishing appropriate notices, providing adequate review time for relevant documents, and responding to significant concerns.

2. Prior to the submission of this funding proposal, Council Bluffs and some representative owners of potentially environmentally impaired sites have been involved in discussions with the City Public Health Department and Iowa Department of Natural Resources, Iowa Department of Economic Development and Iowa Department of Transportation about the environmental concerns of the targeted area, its implications to human health and future reuse. The City will perpetuate this relationship with these

agencies and the U.S. EPA as necessary. To the extent possible, the City will likely pursue enrollment in the Iowa Land Recycling Program or equivalent cleanup program; consequently, it is in the City's best interest to engage appropriate regulatory agencies as early as possible and seek their counsel in cleanup and reuse decisions.

3. The City believes that by using a wide array of communication mechanisms, community understanding will increase and dialogue that is more meaningful will result. Consequently, the City will host frequent open houses to share results from field studies and engage citizens in sharing ideas and opinions concerning cleanup options. The City will also conduct presentations to various interest groups, City Council, and others concerning the progress of the project. Additionally, information will be shared through the City's Internet Website. Representatives from the South Main Brownfields Steering Committee will also be tasked with the responsibility to share information with their respective groups as a means of cross pollinating stakeholders with information and soliciting feedback that can be shared with the Steering Committee.

According to the 2000 U.S. Census, only a small fraction of the target area residents speaks languages other than English as their primary language. In fact, only four percent of the residents in part of the target area speak fluent Spanish, Indo-European, or Asian languages combined. Consequently, in those unique situations where information requires translation, the City will accommodate requests on an as needed basis. The City will also try to accommodate individuals with hearing or visual impairments.

4. The table below highlights the participants involved in this project, their contact information and a summary of their role in the project.

Contact	Phone Number	Agency/Association	Organization's Activities
Bob Mundt, President/CEO	712-325-1000	Council Bluffs Chamber of Commerce	Business retention and attraction
Sheryl Garst	712-325-1000	Pottawattamie County Development Corp.	Conduct land banking and redevelopment activities.
Greg Reeder, City Engineer	712-328-4635	City of Council Bluffs Public Works Department	Plans and implements capital improvements throughout the City.
Doug Drummy, Director	712-328-1008	Council Bluffs Water Works	Plans and implements capital improvements concerning water projects in Council Bluffs.
Donn Dierks, Director	712-328-4666	Council Bluffs Public Health Department	Focuses on improving, protecting and promoting the health, environment and the well-being of residents in Council Bluffs
Ron Hopp, Director	712-328-4650	Council Bluffs Parks, Recreation & Public Property Department	Responsible for the construction, management and maintenance of parks and publicly-owned property in Council Bluffs

Contact	Phone Number	Agency/Association	Organization's Activities
Tom Jensen, Executive Director	712-323-5995	Council Bluffs Senior Center Inc.	Operates and directs programming for this non-profit organization located in the target area.
Gina Primmer, Executive Director	712-328-9476	Habitat for Humanity	Builds housing for low-income residents and has a facility in the target area.
Joe Kueper, Executive Director	712-328-6602	Community Housing Investment Corporation	Builds Infill housing for low and moderate-income residents throughout the city.

G. Reduction of Threats to Human Health and the Environment

1. The subject property is impacted by contaminants commonly associated with former manufactured gas plants. This includes heavy metals, volatile and semi-volatile organic compounds, Coal Tar, and PAHs. These contaminants are also known carcinogens. In fact, findings associated with the Phase II ESA completed confirm this fact. The City's intent is to excavate Range 1 soils, replace with clean fill materials, and address any other contaminants formerly identified during previous Phase II ESA activities. The City of Council Bluffs has an Ordinance that prohibits the construction of private wells; therefore, the risk of groundwater contamination is addressed through this institutional control.

The City will also enroll the property in Iowa's Land Recycling Program (LRP). Through the application of risk-based action levels, the City will use a series of engineered and/or institutional controls, plus removal actions to mitigate exposure to humans. In addition, enrolling eligible sites in the LRP also provides for the long-term management of the contaminant(s) through the redevelopment process and into perpetuity.

Of course, as cleanup alternatives are identified and evaluated via the Risk Evaluation Response Action (RE/RA) Plan, the City will engage the public in determining which option most effectively addresses the environmental threat. The continued involvement of the EPA, Iowa DNR, and City's Public Health Department is important to the successful implementation of any remedial action within the South Main Brownfields Project area.

2. The City has been working with the EPA, Iowa DNR, and City Health Department to discuss the findings of environmental investigations and evaluate appropriate responses. Findings resulting from the initial Phase II ESAs indicate concerns principally to soil and groundwater. In this regard, the City has been coordinating with the referenced agencies. In addition, the EPA, IDNR, City Health Department, Community Development Department, and Pottawattamie County Development Corporation are working together to assemble a strategy that will enable the planned \$11.4 million conversion of a former International Harvester building into a 36 unit live/work space facility in the South Main Project Area. In fact, this project is occurring on a lot adjacent to this subject property.

This working relationship has been extremely collaborative and is finding the appropriate balance in protecting threats to public health and helping facilitate renewed investment in targeted properties.

H. Leveraging of Additional Resources

1. Much of the success already realized in the South Main Project Area is due to the commitment of local funds and in-kind assistance provided with a variety of staff dedicated to transform this community liability into a regional example of renewed investment and neighborhood stability. The summary below lists locally dedicated funds and resources that address needs not met by the Assessment Grant.
 - In-Kind Services: As with the initial EPA Brownfield Assessment Grant awarded in 2005, the City will continue to commit the necessary staff resources to successfully implement this initiative. This generally comes in the form of consultant management; public involvement; monitoring report preparation, and review; securing access agreements; etc. In addition, inter-organizational coordination (e.g., economic development, public works projects, etc.) have implications for coordinating environmental investigations.
 - General Fund/Enterprise Supported Activities: The City invests capital through both the general fund and respective enterprise funds for capital improvement projects in the South Main area. These investments focus on site acquisition and land banking, as well as utility and transportation improvements.
 - Urban Renewal/Tax Increment Financing: These funds are dedicated to providing financial inducements for developers that invest in the South Main Target Area.
 - Community Development Block Grants: As an entitlement city, Council Bluffs directs a portion of its CDBG allocation into the South Main Area in support of programs that benefit low-to-moderate income individuals.
 - Private Sector: The City's economic development partner, Pottawattamie County Development Corporation, works successfully with private, for-profit developers to convert land banked properties into reuse projects that provides renewed investment in the city's core, plus enhances the tax base and creates jobs.
 - Iowa Enterprise Zone Designation: The South Main Brownfields Target Area is within an Iowa designated Enterprise Zone. This designation provides an array of tax credits and related financial inducements for private sector developers and employers to locate with the affected area and encourage new job creation.
2. Council Bluffs has also been very successful in leveraging funds that contributes to the redevelopment of the South Main Brownfields Project. These sources are cited below.
 - Iowa Brownfield Redevelopment Fund awarded a \$75,000 grant to remove lead contamination from a project site.
 - The Iowa West Foundation has provided significant financial support for the Artspace project cited in this application and to help fund local streetscape projects.
 - A \$297,000 Federal Economic Development Initiative grant was provided to fund infrastructure improvements in the project area.
 - The State of Iowa Designated an Enterprise Zone in Council Bluffs.
 - The City received Revitalizing Iowa's Sound Economy (RISE) transportation funding to help accommodate new business in Council Bluffs.

- The City secured a \$24 million Vision Iowa Grant and \$7 million loan from the Vision Iowa Program for the Mid-America Recreation & Convention Complex in Council Bluffs.
- The City is applying for a Low Income Housing Tax Credits through the Iowa Finance Authority as part of the Artspace/International Harvester building renovation project.
- Secured an Iowa Local Housing Assistance Program Grant for housing and infrastructure improvements.
- The City has secured several Resource Enhancement and Protection program grant through the Iowa DNR for park development.
- The City received Local Housing Assistance Program funds and Home Investment Partnership Program funds from the Iowa Department of Economic Development to provide down-payment assistance to low and moderate income first time home buyers through the City's infill housing program.
- The City's Health Department has secured funding from various sources to assist with providing free/reduced immunizations for children, providing free/reduced flu shots for the elderly, expanding recycling efforts, and renovations to the City's animal shelter

I. Programmatic Capability

1. Having been awarded two EPA Brownfield Assessment Grants in 2005, the City of Council Bluffs is in full compliance with all reporting requirements associated with the Cooperative Agreement. As before, the City of Council Bluffs will continue as the grant manager based on its experience in managing federal contracts and proven ability to oversee all phases of work under this grant. Mr. Donald Gross, Director of Community Development will be assigned grant management responsibilities. Additionally, Ms. Tina Hochwender, CD Project Coordinator will provide assistance as needed by Mr. Gross. Mr. Gross and Ms. Hochwender have the requisite experience to meet the financial management needs of this project. Several federal and state grants currently being administered by the City of Council Bluffs include an Economic Development Initiative Grant, Economic Development Administration funding, public safety grant (COPS), Community Development Block Grant (CDBG), Home Investment Partnership (HOME) Program, Federal Emergency Management Agency (FEMA) Project Impact Grant, and an Iowa Department of Transportation Revitalizing Iowa's Sound Economy (RISE) roadway improvement grant.

The City has also achieved several significant accomplishments using two Brownfield Assessment Grants awarded in 2005. They include:

- Completed 26 Phase I ESAs and 17 Phase II ESAs
- Attended the 2006 National Brownfields Conference in Boston and attended work shops that provide greater insight in how Council Bluffs can improve the potential of redeveloping brownfield properties.
- Leveraged \$75,000 through the Iowa Brownfield Redevelopment Fund, to remove lead contamination from a property within the South Main Target Area.
- Participating in the reuse of a former International Harvester building within the Brownfield Target area. The City used a portion of its Assessment Grant to complete environmental investigations on the subject property and is currently working with a developer to transform this property into a 36 unit live/work space affordable housing development with 9 artist studios and galleries. The estimated cost of this project is \$11.4 million.

- Pottawattamie County Development Corporation and the City worked together to complete environmental investigations that resulted in the acquisition of several properties within the South Main Project Area. These properties have been subsequently placed into a land bank for future redevelopment opportunities.
 - Several street reconstruction projects have resulted within the target area - South Main, South 7th and South 8th Streets, and portions of 9th Avenue.
2. The City of Council Bluffs Community Development Department has managed several federal grants, including approximately \$1.2 million annually in CDBG and HOME program funds. The department has also worked with the Economic Development Administration on various funding programs. The City has the internal fiscal controls in place to ensure the proper management of funds. Our most recent audit dated June 30, 2007 indicates no adverse findings. Additionally, the City is not presently, nor has been subject to comply with special "high risk" terms and conditions associated with agency regulations implementing OMB Circular A-102.
 3. The City of Council Bluffs was awarded two Brownfield Assessment Grants in 2005 and is in full compliance with all monitoring report requirements including quarterly reports, financial reports, etc.
 4. The City of Council Bluffs will develop a detail schedule and work plan for implementing planned tasks under this proposed cooperative agreement. The work plan will detail key milestone dates within the grant period for documenting and communicating outputs and outcomes to the public, EPA Region 7, and other partners in this redevelopment effort. At a minimum, outputs and outcomes will be detailed in quarterly reports to EPA Region 7. In addition, some of the bulleted items described in Section J. 1. above will be implemented to track, measure, and communicate progress toward expected outputs and outcomes.